

EXHIBIT 1

EXHIBIT 1—CLAIM LISTING

Identifier	Claim Language	Status
'969 Patent		
1[pre]	A portable device configured to communicate with a terminal comprising a processor, an input component, an output component, a network communication interface, and a memory configured to store executable program code, including first program code which, when executed by the terminal processor, is configured to present an interactive user interface on the terminal output component, and second program code which, when executed by the terminal processor, is configured to provide a communications node on the terminal to facilitate communications to the portable device and to a communications network node through the terminal network communication interface, the portable device comprising:	Invalid per Ingenico verdict
1[a]	(a) an external communication interface configured to enable the transmission of communications between the portable device and the terminal;	Invalid per Ingenico verdict
1[b]	(b) a processor; and	Invalid per Ingenico verdict
1[c]	(c) a memory having executable program code stored thereon, including:	Invalid per Ingenico verdict
1[c][i]	(1) third program code which, when executed by the portable device processor, is configured to provide a communications node on the portable device to coordinate with the communications node on the terminal and establish a communications link between the portable device and the terminal, and facilitate communications to the terminal and to a communications network node through the terminal network communication interface; and	Invalid per Ingenico verdict
1[c][ii]	(2) fourth program code which is configured to be executed by the portable device processor in response to a communication received by the portable device resulting from user interaction with the interactive user interface;	Invalid per Ingenico verdict

Identifier	Claim Language	Status
1[d]	wherein the portable device is configured to facilitate communications through the communication node on the terminal and the terminal network interface to a communications network node.	Invalid per Ingenico verdict
2.	The portable device according to claim 1, wherein the fourth program code which, when executed by the portable device processor, is configured to cause a communication to be transmitted to the communication network node.	Invalid per Ingenico verdict
4.	The portable device according to claim 2, wherein the communication caused to be transmitted to the communication network node <i>facilitates the transmission of encrypted communications from the communication network node to the terminal.</i>	IOENGINE wants to add
7.	The portable device according to claim 2, wherein the communication network node comprises a database and the communication caused to be transmitted to the communication network node <i>facilitates the download of program code on the communication network node to the terminal.</i>	IOENGINE wants to add
10.	The portable device according to claim 2, wherein the communication network node comprises a database and the communication caused to be transmitted to the communication network node facilitates <i>synchronizing content on the portable device with content on the communication network node database.</i>	Currently asserted

Identifier	Claim Language	Status
'703 Patent		
55[pre]	A method implemented on a portable device comprising a processor, a memory having executable program code stored thereon, and an external communication interface for enabling the transmission of a plurality of communications between the portable device and a terminal, the terminal comprising a processor, an input component, an output component, a network communication interface, and a memory configured to store executable program code, including first program code which, when executed by the terminal processor, is configured to affect the presentation of an interactive user interface by the terminal	Invalid per Ingenico verdict

Identifier	Claim Language	Status
	output component, and second program code which, when executed by the terminal processor, is configured to provide a communications node on the terminal to facilitate communications to the portable device and to a communications network node through the terminal network communication interface, the method comprising:	
55[a]	(a) causing the terminal to execute the first program code to affect the presentation of an interactive user interface by the terminal output component;	Invalid per Ingenico verdict
55[b]	(b) executing third program code stored on the portable device memory to provide a communications node on the portable device configured to coordinate with the communications node on the terminal and establish a communications link between the portable device and the terminal, and to facilitate communications to the terminal and to a communications network node through the terminal network communication interface;	Invalid per Ingenico verdict
55[c]	(c) executing, in response to a communication received by the portable device resulting from user interaction with the interactive user interface, fourth program code stored on the portable device memory to cause a communication to be transmitted to a communications network node; and	Invalid per Ingenico verdict
55[d]	(d) facilitating communications through the terminal network communication interface to a communications network node.	Invalid per Ingenico verdict
61.	The method according to claim 55, wherein the step of executing fourth program code stored on the portable device memory causes a communication to be transmitted to the communications network node to <i>facilitate the download of program code from the communications network node to the terminal.</i>	IOENGINE wants to add
62.	The method according to claim 55, wherein the step of executing fourth program code stored on the portable device memory causes a communication to be transmitted to the communications network node to <i>facilitate the download of program code from the communications network node to the portable device.</i>	IOENGINE wants to add
104[pre]	A system implementing a terminal having a processor, an input component, an output component, a network communication interface, and a memory configured to store executable program code, including first program code which, when executed by the	Invalid per Ingenico verdict

Identifier	Claim Language	Status
	terminal processor, is configured to affect the presentation of an interactive user interface by the terminal output component, and second program code which, when executed by the terminal processor, is configured to provide a communications node on the terminal to facilitate communications to and from the terminal, the system comprising:	
104[a]	(a) a communications network node; and	Invalid per Ingenico verdict
104[b]	(b) a portable device comprising an external communication interface for enabling the transmission of a plurality of communications between the portable device and the terminal, a processor, and a memory, wherein the memory has executable program code stored thereon, the portable device configured to:	Invalid per Ingenico verdict
104[b][i]	(1) cause the terminal to execute the first program code to affect the presentation of an interactive user interface by the terminal output component;	Invalid per Ingenico verdict
104[b][ii]	(2) execute third program code stored on the portable device memory to provide a communications node on the portable device configured to coordinate with the communications node on the terminal and establish a communications link between the portable device and the terminal, and to facilitate communications to the terminal and to a communications network node through the terminal network communication interface;	Invalid per Ingenico verdict
104[b][iii]	(3) execute fourth program code stored on the portable device memory in response to a communication received by the portable device resulting from user interaction with the interactive user interface to cause a communication to be transmitted to a communications network node; and	Invalid per Ingenico verdict
104[b][iv]	(4) facilitate communications through the terminal network communication interface to a communications network node.	Invalid per Ingenico verdict
110.	The system according to claim 104, wherein the portable device is configured to execute the fourth program code to cause a communication to be transmitted to the communications network node to <i>facilitate the download of program code from the communications network node to the terminal.</i>	IOENGINE wants to add

Identifier	Claim Language	Status
111.	The system according to claim 104, wherein the portable device is configured to execute the fourth program code to cause a communication to be transmitted to the communications network node to <i>facilitate the download of program code from the communications network node to the portable device.</i>	IOENGINE wants to add
114.	The system according to claim 104, wherein the portable device is configured to execute the fourth program code to cause a communication to be transmitted to the communications network node to facilitate <i>synchronizing content on the portable device with content on the communications network node.</i>	Currently asserted

EXHIBIT 2

EXHIBIT 2—PAYPAL’S PROPOSED SCHEDULE

Event	Date
Responsive status conference briefs	June 20, 2025
PayPal’s opening summary judgment brief on preclusion re invalidity and noninfringement	1-week after authorization
IOENGINE’s summary judgment opposition brief	2-weeks after opening brief
PayPal summary judgment reply brief	1-week after opposition brief
Summary judgment hearing	At the Court’s convenience
Deadline to depose IOENGINE experts on supp. reports	August 29, 2025
PayPal’s expert reports rebutting IOENGINE’s supplemental reports	September 12, 2025
Deadline to depose PayPal experts on rebuttal reports	September 19, 2025
<i>Daubert</i> motions re supplemental reports	October 3, 2025
<i>Daubert</i> opposition briefs	October 17, 2025
<i>Daubert</i> reply briefs	October 24, 2025
<i>Daubert</i> hearing	At the Court’s convenience
Bench trial (if needed) on privity and PayPal’s §101 defense	December , 2025
IOENGINE to serve proposed joint pre-trial order	January 14, 2026
PayPal to serve proposed joint pre-trial order	February 5, 2026
File joint pre-trial order	February 20, 2026
Each party to file (i) proposed <i>voir dire</i> questions, (ii) proposed preliminary jury instructions, (iii) proposed final jury instructions, and (iv) a proposed verdict form	March 3, 2026
Final pre-trial conference	March 6, 2026
Jury trial	March 23, 2026 ¹
Post-trial briefing	TBD
Inequitable conduct bench trial (if necessary)	TBD

¹ PayPal’s technical expert has international travel commitments and will be out of the country March 8-15.

EXHIBIT 3

(12) **INTER PARTES REVIEW CERTIFICATE** (3753rd)

**United States Patent
McNulty**

(10) **Number:** **US 9,059,969 K1**
(45) **Certificate Issued:** **Oct. 10, 2024**

(54) **APPARATUS, METHOD AND SYSTEM FOR
A TUNNELING CLIENT ACCESS POINT**

(71) Applicant: **Scott McNulty**

(72) Inventor: **Scott McNulty**

(73) Assignee: **IOENGINE, LLC**

Trial Number:

IPR2019-00879 filed Mar. 25, 2019

Inter Partes Review Certificate for:

Patent No.: **9,059,969**
Issued: **Jun. 16, 2015**
Appl. No.: **13/960,514**
Filed: **Aug. 6, 2013**

The results of IPR2019-00879 are reflected in this inter partes review certificate under 35 U.S.C. 318(b).

INTER PARTES REVIEW CERTIFICATE

U.S. Patent 9,059,969 K1

Trial No. IPR2019-00879

Certificate Issued Oct. 10, 2024

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AS A RESULT OF THE INTER PARTES
REVIEW PROCEEDING, IT HAS BEEN
DETERMINED THAT:

Claims 3, 4, 7, 10-12 and 26 are found patentable.

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Claims 1, 2, 5, 6, 8, 13-16, 19-21, 24, 25 and 27-29 are
cancelled.

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EXHIBIT 4

(12) **INTER PARTES REVIEW CERTIFICATE** (3764th)

**United States Patent
McNulty**

(10) **Number:** US 9,774,703 K1
(45) **Certificate Issued:** Oct. 15, 2024

(54) **APPARATUS, METHOD AND SYSTEM FOR
A TUNNELING CLIENT ACCESS POINT**

(71) Applicant: **Scott McNulty**

(72) Inventor: **Scott McNulty**

(73) Assignee: **IOENGINE, LLC**

Trial Number:

IPR2019-00929 filed Apr. 5, 2019

Inter Partes Review Certificate for:

Patent No.: **9,774,703**
Issued: **Sep. 26, 2017**
Appl. No.: **14/721,540**
Filed: **May 26, 2015**

The results of IPR2019-00929 are reflected in this inter partes review certificate under 35 U.S.C. 318(b).

INTER PARTES REVIEW CERTIFICATE
U.S. Patent 9,774,703 K1
Trial No. IPR2019-00929
Certificate Issued Oct. 15, 2024

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AS A RESULT OF THE INTER PARTES
REVIEW PROCEEDING, IT HAS BEEN
DETERMINED THAT:

Claims **56, 61, 62, 65, 66, 75, 90, 101, 105, 110, 111, 114,** ⁵
115 and **124** are found patentable.

Claims **55, 57-60, 63, 67-72, 74, 77, 78, 81-87, 89, 92-98,**
100, 103, 104, 106-109, 112, 116-121, 123 and **126-129** are
cancelled.

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